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Attorney for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

DANIEL D'AMBLY; AARON WOLKIND;
STEVE HARTLEY; RICHARD SCHWETZ;
JOBEL BARBOSA; MATTHEW
REIDINGER; JOHN HUGO; SEAN-
MICHAEL DAVID SCOTT; THOMAS
LOUDEN; ZACHARY REHL; AMANDA
REHL; K.R., a minor, by and through her
father ZACHARY REHL and her mother
AMANDA REHL, MARK ANTHONY
TUCCI,

Plaintiffs,

vs.

CHRISTIAN EXOO a/k/a ANTIFASH
GORDON; ST. LAWRENCE UNIVERSITY;
TRIBUNE PUBLISHING COMPANY, LLC;
NEW YORK DAILY NEWS; VIJAYA
GADDE; TWITTER, INC; COHEN, WEISS
AND SIMON, LLP; NICK STRICKLAND;
TORCH ANTIFA NETWORK; UNNAMED
ASSOCIATES 1 – 100,

Defendants.

CIVIL ACTION NO.: 2:20-cv-12880-JMV-JSA

AFFIDAVIT OF DEFAULT

I, PATRICK TRAINOR, of full age, hereby deposes and says:

1. I am an attorney-at-law of the State of New Jersey and associated with the firm of the Law Office of Patrick Trainor, Esq., LLC, attorneys for the Plaintiffs in the above-entitled

action. In this capacity, I am authorized to make the instant Affidavit on behalf of the Plaintiff in this case.

2. On December 8, 2021, a process server acting on behalf of Plaintiff and its counsel, who does not have a direct interest in this litigation attempted to personally serve defendant JOHN “NICK” STRICKLAND at his residence located at 82 Kuhlthau Avenue, Milltown, New Jersey 08850 with a Summons in a Civil Action and a copy of the Verified Complaint.

3. At the time the process server attempted personal service at 82 Kuhlthau Avenue, Milltown, NJ 08850 personal service could not be completed, because the responding occupant claimed defendant no longer resided at that location and no forwarding address was available. Copies of the process server’s notice of incomplete service is attached hereto as Exhibit A.

4. Upon diligent inquiry, I cross-referenced defendant’s name and address with publicly available court records and discovered a judgment of conviction dated December 21, 2021, entered against defendant in Middlesex County Superior Court under case number MID-21-002866 for the charges he was arrested for on August 8, 2021, however, the record reflects 82 Kuhlthau Avenue, Milltown, NJ 08850 as defendant’s address. *See* ECF No. 125 at 10.

5. Upon diligent inquiry, to locate defendant’s present address, in addition to public record searches I cross-referenced defendant’s cell phone number (732) 744-4937 with commercially available reverse phone number search tools, however, defendant’s cell phone number is associated with his former address, and these searches did not produce defendant’s current address.

6. Upon information and belief, consistent with the allegations in defendant’s judgment of conviction in case number MID-21-002866 that was on December 21, 2021, at all

times relevant to this dispute, defendant is believed to be unemployed, therefore, I was unable to locate defendant with employment record searches.

7. Through subsequent investigation, Plaintiffs have developed the reasonable belief that defendant no longer resides in the State of New Jersey and his present whereabouts are unknown.

8. The time within which the said defendant may answer or otherwise move as to the Verified Complaint has expired and has not been extended or enlarged. The defendant named herein has not answered or otherwise moved or defended the action.

9. I certify under penalty of perjury that the foregoing is true and correct.

Dated: May 6, 2022



PATRICK TRAINOR, ESQ.